

EXHIBIT 31

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

K.C., et al.,

Plaintiffs,

v.

THE INDIVIDUAL MEMBERS
OF THE MEDICAL LICENSING
BOARD OF INDIANA, in their
official capacities, et al.,

Defendants.

No. 1:23-cv-00595-JPH-KMB

DECLARATION OF XANDRA ROBERTSON

I, Xandra Robertson, pursuant to the provisions of 28 U.S.C. § 1746, do hereby declare as follows:

1. My name is Xandra, and I am 31 years old, and I have personal knowledge of the matters stated in my testimony.

2. I am a detransitioned woman (natal female) who identified as a transgender man for a total of ten years, which included four total years of testosterone supplementation. I became interested in the trans community in 2009 around the age of 17 when a school friend identifying as “genderqueer” introduced me to the LGBT Vlogging community on Youtube. In 2010, I came out as transgender as a senior in high school, at the age of 18.

3. I do not believe that minors should have access to transgender-related treatments, including medical interventions. There was a time in my own life that

I felt truly dysphoric. In high school, when I discovered the concept of changing genders through a "genderqueer" schoolmate, it was appealing and relatable. I hated my body and wanted out of it. I wanted to be strong, confident, and brave. I was a tomboy with masculine traits and interests. I was hassled for being a lesbian and felt like there was no one like me. I struggled to make friends and fit in my whole life, so it was easy to relate to the idea that "I always felt different." It was my understanding of what it meant to be dysphoric. I also struggled with alcohol all through high school, earning me a reputation for being dramatic and no fun. Being a straight man sounded so much easier as I viewed men as people who were capable of emotional control.

4. I did not begin testosterone until I was an adult due to financial and insurance barriers. Immediately after high school, I joined the military which at the time prevented me from pursuing medical transition since it would not have been allowed. However, I was "socially transitioned" for six or seven years and was adamant that my gender identity and pronouns be accepted and respected.

5. Around the age of 22, I met and married a lesbian woman who affirmed my gender identity during the beginning of our relationship. I was able to begin testosterone for a period of four or five months, but the cost was too expensive and not covered by insurance. I stopped the testosterone and did not begin again for quite a few years.

6. My pursuit of transition put pressure on my marriage. My wife realized she did not want to be seen as a straight woman because she considered herself a

lesbian. She tried to dissuade and prevent me from pursuing hormones or surgeries throughout our marriage, and luckily during that period of time there were more requirements in order to access testosterone. She was uncomfortable trying to defend my identity when she did not fully understand it herself, and uncomfortable answering questions that others had about my desire to transition.

7. In February 2017, we divorced. Shortly thereafter, I sustained a self-inflicted injury to my right wrist which required emergency surgery to repair. It was only three months later in May of that year that I began testosterone.

8. I also put pressure on my immediate family to defend something they did not believe in, preventing them from being true to their values. As someone who struggled socially throughout my life, I lost so many people I cared about and I became lonely, isolated, and resentful.

9. I was convinced that transitioning was still right for me, telling myself that since I had been identifying as a man for so long, it was no longer possible for me to be wrong. I was 26 when I began testosterone.

10. Despite the disclosure of my mental and emotional issues, including that I had been sexually assaulted at the age of four, raped the same year I decided to transition (age 18), and struggled with alcoholism since I was 14, a doctor prescribed testosterone to me. None of these issues were ever addressed by a mental health professional. I was also actively recovering from a self-inflicted wound on my wrist that required emergency surgery. I was still wearing a specially-made brace on my wrist, and do not recall the doctor asking about it. Instead of advising me to

seek therapy, to get sober, or even to make some lifestyle changes first, I left her office with a prescription for testosterone as well as a prescription to treat my new diagnosis of “bipolar.”

11. I signed the informed consent, assuming I already understood all the side effects, and my doctor only really talked to me about superficial changes such as voice changes, hair growth/loss, and cessation of my menstrual cycle, all things that I expected and desired. Throughout these 12 years of identifying as the opposite gender, I had never seen a therapist. I also never saw that doctor again for a follow-up, my prescriptions were always automatically refilled.

12. I came to realize that I had lost my entire twenties attempting to pursue the impossible: there was no way to ever truly transition and become the other gender. Transitioning meant that I would always need medication and need further medical procedures, which would create financial strain and impair my quality of life. I was angry, tired, depressed, and intoxicated almost every hour of the day.

13. I came to realize that I had pushed everyone in my life away. Even my immediate family had ceased all communication with me by the time I was 29, frustrated with my emotional instability and outbursts. I began to question the steep rise in people identifying as transgender, and asked myself what exactly I thought testosterone was supposed to solve. I also asked myself if it was possible that I fell for a social contagion. I began to realize that my feelings of “dysphoria” were strongest during periods of my life that were extremely difficult. For example, I came out as transgender the same year two men—who were more than twice my

age—sexually abused me. As another example, I began testosterone the same year I got divorced and sustained a life-threatening injury. I looked back on the ten previous years and saw that not only was there no improvement to my mental health in the years I was identifying as a transgender man, but I had progressively gotten worse. I was living in a filthy apartment that smelled like cigarette smoke, and all my money went towards paying for testosterone and feeding my alcoholism.

14. At the end of 2020, just before I turned thirty and after several years of hormones, I attempted suicide. This was close to a month, maybe two, after stopping testosterone. I was feeling desperate, not sure if I would ever be able to turn back and present as female. I had not attempted to look, act, or present as a female since I was about 18 and wasn't sure I would ever be able to. The emergency responders who showed up at my apartment that morning intended on taking me to a hospital to be placed on suicide watch. However, when I asked them what would happen to my cat and dog, they informed me that they would be sent to the humane society. I pleaded with them to let me stay home and to not take away my pets. "They are all I have left" is what I told them. For 24 hours, police periodically checked on me in my apartment. That week is when I sought a therapist for the first time, and I continue to see a therapist regularly to this day.

15. The pursuit of transition had pushed away my family, destroyed my marriage, and made meaningful relationships nearly impossible to attain. Testosterone then created a person that I no longer recognized in the mirror, created financial strain, and gave me what I now realize is true dysphoria. Neither

social or medical transition alleviated any of the mental or emotional distress I experienced for many years, and the use of testosterone in particular made existing struggles (i.e., alcohol and drug use, anxiety, depression, financial hardship) far more severe.

16. I believe that at least being an adult saved me from further damage. I did not interrupt my developing body. I was able to turn back with the help of real therapy, focusing on health and sobriety, and learning to think of others before myself. It did not occur to me for a long time how my transition affected the people around me.

17. However, I continue to deal with lingering effects of hormones such as facial hair growth, deepened voice, and back pain/posture issues from many years of chest binding. It is currently unknown if binding caused any damage to breast tissue that could prevent me from breastfeeding in the future, and it is also unknown how the use of testosterone has affected my fertility, or to what extent.

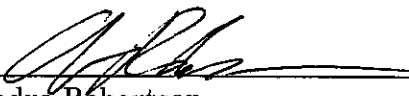
18. Stopping testosterone also made me realize that I was addicted to a drug. It was a chemical that I came to depend on and without it, my body suffered withdrawals. Missing a dose would cause side effects such as fatigue and mood swings. Once my body had shut off its natural production of hormones, it relied on an injection every week to feel "normal." This is physical dependence or addiction, and it took time to recover from. Stopping testosterone created side effects similar to menopause, including weakness, vaginal dryness, fatigue, hot flashes, night sweats, and severe mood swings. It was six months before I had a period, and had

frequent, irregular bleeding for another six months or so. In total, I would say it took about a year for my body to level out and have regular, predictable cycles. Detransition also came with its own expenses, such as laser hair removal, which did not fully solve the problem of facial hair growth. Detransition also created more confusion in situations such as work or within my community, as I was often mistaken for a transwoman. For me, the solution was to leave my job and move.

19. Looking back, I am thankful that there were more barriers that prevented me from transitioning earlier on, even into adulthood, and wish those barriers still existed today. When I first came out as transgender all those years ago, things like long term therapy and multiple recommendations were required, and to my knowledge, almost no insurance would cover gender transition procedures. Today, too many kids are losing body parts and causing irreversible harm to their bodies and minds because access to drugs and surgeries has become too easy.

20. More emphasis needs to be placed on staying off the internet, seeking therapy, and building strong relationships so that detrimental mistakes won't happen in the future. Parents should challenge their children on their beliefs with love and logic. Children suffering from gender dysphoria have more options, as well as their parents. I'm confident that many would overcome dysphoria without becoming lifelong medical patients.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on 5/31, 2023.


Xandra Robertson